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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

2002 MAR -6 P 4:01

UNITED STATES OF AMERICA

v.

JAMES ANTHONY SAVAGE,
also known as Mario J. Racanelli,
John Racanelli, Mark Racanelli,
Grandoni Egistot, Egisto Grandoni,
Robert Tোলiano, M. John Delano,
Greg Eric Masonotti, and Max
Marrache
MARGARET NATHALIE HANDSMAN, also
known as Marnie Handsman,
Margaret Racanelli, and Marnie
Racanelli

1:01CR362-1 ✓

1:01CR362-2

FILED
U.S. DISTRICT COURT
GREENSBORO, NC

STIPULATIONS

NOW COME the United States of America, by Anna Mills Wagoner, United States Attorney for the Middle District of North Carolina, through her assistants, Clifton T. Barrett and Douglas Cannon, and the defendants, James Anthony Savage and Margaret Nathalie Handsman, in their own persons and through their respective attorneys, Nils Gerber and Lisa Costner, and stipulate and agree that the facts set forth on the attached Four stipulations are true and correct:

STIPULATION ONE - TELEPHONE RECORDS

1. Government's Group Exhibit Number 1A contains records of AT&T Wireless relative to mobile number (941)350-3965 in the name of Marnie Handsman. Records contain subscriber, billing

information, and data for the period between August 1, 1998, through July 3, 2000.

2. Government's Group Exhibit Number 1B contains records of AT&T Wireless relative to mobile number (941)320-5985 in the name of Marnie Handsman, containing a bill dated July 1, 1999.

3. Government's Group Exhibit Number 1C contains records of AT&T Wireless relative to mobile number (305)798-8387 in the name of Marnie Handsman. The records contain subscriber, billing information, and data for the period between December 5, 1999, through April 7, 2000.

4. Government's Group Exhibit Number 1D contains records of BellSouth Telecommunications relative to telephone number (336)725-7059, in the name of Sam Handsman, Jr. and Kim Handsman for subscriber information and call detail record for February 8, 2001, 6:53 a.m. through 2:48 p.m.

5. Government's Group Exhibit Number 1E contains records of BellSouth Telecommunications relative to telephone numbers (336)748-1105 and (336)748-1143 in the name of Jean Foster. The records contain subscriber, billing information, and data for the period between November 28, 1996, through January 28, 2000.

6. Government's Group Exhibit Number 1F contains records of Cingular Wireless relative to mobile number (215)264-8888 in the name of Mario Racanelli. The records contain subscriber, billing

information, and data for the period between November 10, 2000, through February 10, 2001.

7. Government's Group Exhibit Number 1G contains records of Nextel Communications relative to mobile number (941)650-6851 in the name of Marnie Handsman, d/b/a Rich Offerings. The records contain subscriber, billing information, and data for the period between May 10, 2000, through August 8, 2000.

8. Government's Group Exhibit Number 1H contains records of Nextel Communications relative to mobile number (941)650-6852 in the name of Marnie Handsman, d/b/a Rich Offerings. The records consist of subscriber, billing information, and data for the period between May 10, 2000, through July 9, 2000.

9. Government's Group Exhibit Number 1I contains records of Nextel Communications relative to mobile number (941)650-9420 in the name of Marnie Handsman, d/b/a Rich Offerings. The records consist of subscriber, billing information, and data for the period between September 8, 2000, through November 8, 2000.

10. Government's Group Exhibit Number 1J contains records of Nextel Communications relative to mobile number (941)650-5642 in the name of Tommy Vayias. The records contain subscriber, billing information, and data for the period between December 15, 2000, through January 14, 2001.

11. Government's Group Exhibit Number 1K contains records of Skytel Communications relative to pager number 800-314-7012, in the

name of Mario Racanelli, for the period between October, 1999, through August, 2000, and December, 2000, through February, 2001.

12. Government's Group Exhibit Number 1L contains records of Sprint Spectrum LP relative to mobile number (310)428-1429 in the name of Max Henry Marrache. The records contains subscriber, billing information, and data for the period between July 27, 2001, through August 24, 2001.

13. Government's Group Exhibit Number 1M contains records of Verizon Wireless relative to telephone number (336)407-3426, in the name of Mario Racanelli. The records include a bill dated February 22, 2000, and subscriber information.

14. Government's Group Exhibit Number 1N contains records of Verizon (Formerly GTE) relative to telephone number (941)343-9306 in the name of Marnie Handsman. The records contain subscriber, billing information, and data for the period between January 16, 1999, through September 16, 1999.

15. Government's Group Exhibit Number 1O contains records of Verizon Wireless (Formerly GTE) relative to telephone number (941)349-7220 in the name of Marnie Handsman. The records contain subscriber, billing information, and data for the period billed between March 28, 1999, through July 28, 2000.

16. Government's Group Exhibit Number 1P contains records of Verizon (Formerly GTE and Cellular One) relative to mobile number (336)407-3426 in the name of Mario Racanelli. The records contain

subscriber, billing information, and data for the period billed between June 22, 1996, through January 22, 2000.

17. Government's Group Exhibit Number 1Q contains records of Verizon (Formerly GTE and Cellular One) relative to mobile number (910)418-7349 in the name of Mario J. Racanelli. The records contain subscriber, billing information, and data for the period billed between May 30, 1997, through July 30, 1997, and September 22, 1997, through April 22, 1998.

18. Government's Group Exhibit Number 1R contains records of Verizon (Formerly GTE and Cellular One) relative to mobile number (910)413-1877 in the name of Margaret N. Handsman. The records contain subscriber, billing information, and data for the period billed between March 11, 1996, through April 11, 1996, and June 11, 1996, through July 11, 1996.

19. Government's Group Exhibit Number 1S contains records of Verizon relative to telephone number (941)957-3993 in the name of Marrac Industries, Inc., and contains subscriber information.

20. Government's Group Exhibit Number 1T contains records of Verizon, Formerly GTE, relative to telephone number (941)906-1723 in the name of Rich Offerings, Inc. and Marnie Handsman. The records contain billing information for the period between November 7, 1998, through August 7, 2000.

21. Government's Group Exhibit Number 1U contains records of Voicestream Wireless Corporations relative to telephone number

(646)207-3377, in the name of Loraine Rahm. The records contain a letter dated August 7, 2001, containing subscriber information and statements for the time period January 21, 2001, through February 21, 2001.

22. Government's Group Exhibit Number 1V contains records of Sprint Spectrum L.P. relative to mobile number (310)403-1922, in the name of Max Henry Marrache. The records contain subscriber and billing information for the period June 3, 2001 through July 27, 2001.

23. All parties stipulate that the documents contained in Government's Group Exhibit Number 1, if relevant, are authentic and admissible in evidence pursuant to Federal Rules of Evidence 803(6), as being copies of reports, records, and data compilations kept in the course of regularly conducted business activities of the named businesses and entities.

STIPULATION TWO - BUSINESS RECORDS

1. Government's Group Exhibit Number 2A contains records of A Basic Moving and Storage, Inc., Sarasota, Florida, relative to the move, transport, and storage of personal property from and to 7309 Pine Needle Road, Sarasota, Florida, in the name of Christopher M. Smith, a/k/a Chris Smith and Marnie Handsman during the period February, 2000 through March 2000, to include moving contracts, Bills of Lading and Freight, sales receipts, inventories, invoices, receipts for payment, insurance documents, and correspondence.

2. Government's Group Exhibit Number 2B consists of records of Albert Govberg & Son, Inc., d/b/a Govberg Jewelers, relative to Customer No. 010336, Mario Racanelli. The records contain transaction documents and correspondence.

3. Government's Group Exhibit Number 2C consists of records of Beverly Hills Flower Gallery, Beverly Hills, California. The records consist of invoices with the notations "Sold to Max".

4. Government's Group Exhibit Number 2D consists of records of Braman Motors, Inc. The records are relative to the purchase or sale of the following vehicles:

- A. A 1999 Bentley, Vehicle Identification Number (VIN): SCBZK14E7XCX6178, by Margaret N. Handsman (Hadsman), on April 16, 1999;
- B. A 2000 Bentley, Vehicle Identification Number (VIN): SCBZB22E6YCX63319, by Margaret N. Handsman, on January 3, 2000;

- C. A 2000 Bentley, Vehicle Identification Number (VIN): SCBZB22E6YCX63319, from Margaret N. Handsman, on May 2, 2000; and
- D. A 1999 Bentley, Vehicle Identification Number (VIN): SCBZK14E7XCX61780, from Margaret N. Handsman on May 2, 2000.

5. Government's Group Exhibit Number 2E contains records of Control Storage, Inc., Sarasota, Florida, relative to the rental agreements in the name of Tommy Vayias.

6. Government's Group Exhibit Number 2F contains sales records of Diva Inc., a furniture store in Los Angeles, California, relative to a customer, Max Marrache.

7. Government's Group Exhibit Number 2G contains records of D.M. Diamond, of Houston, Texas, relative to purchases made by Marnie Handsman, Rich Offerings, Inc., and Mario Racanelli.

8. Government's Group Exhibit Number 2H contains records of Executive Auto Sales. The records are relative to the purchase of:

- A. A used 2001 Mercedes CL600, Vehicle Identification Number (VIN): WDBPJ78J41A016861, in the name of Max Marrache and KISIS Group LLC, on June 12, 2001, and
- B. A used 1996 Ford Explorer, Vehicle Identification Number (VIN): 1FMDU34X4TUA38824, by Sharon Taft, on August 4, 2001.

9. Government's Group Exhibit Number 2I contains records of Ferman Motor Car Co., Inc. The records are relative to the lease

of a 2000 Chevrolet Suburban, Vehicle Identification Number (VIN): 3GNFK16T0YG199559, by Margaret N. Handsman, on July 11, 2000.

10. Government's Group Exhibit Number 2J contains records of Four Season Hotels relating to Mario Racanelli, including invoices dated September 24, 1998, through February 1, 2000, telephone detail records for 1998, through 2000, and incident reports from September 18, 1999, through December 18, 1999.

11. Government's Group Exhibit Number 2K contains records of Gates Moving & Storage, of Venice, Florida. The records are relative to the rental of warehouse storage space in the name of Tommy Vayias on September 20, 2000, and moving services.

12. Government's Group Exhibit Number 2L contains records of Hearts on Fire Company, of Boston, Massachusetts, relative to purchases by Rich Offerings, Inc., Marnie Handsman, and a related insurance claim to Mark Pesci.

13. Government's Group Exhibit Number 2M contains records of Hourglass Trading, Inc, Philadelphia, Pennsylvania, relative to purchases made by Rich Offerings, Inc. and Mario Racanelli.

14. Government's Group Exhibit Number 2N contains records of Interstate Automobile Network of Marina Del Ray, California, relative to the purchase of a used 2001 Lexus LX470, Vehicle Identification Number (VIN): JTJHT00W013502454, by DISTAR Investments, LLC, and Max Henry Marrache, on March 2, 2001.

15. Government's Group Exhibit Number 2O contains records of Irving J. Fishman, M.D. relative to Mario Racanelli's patient information record and a photograph.

16. Government's Group Exhibit Number 2P contains records of Kirk-Pinkerton, P.A. relative to the closing file relative to the purchase of real property located at 7309 Pine Needle Road, Sarasota, Florida by Margaret N. Handsman, on February 16, 1999.

17. Government's Group Exhibit Number 2Q contains records of Luminaire, a furniture store, regarding purchases billed to and shipped to Mario Racanelli and Marnie Handsman.

18. Government's Group Exhibit Number 2R contains records of PakMail Centers of America relative to a mailbox rental agreement by Eric Masanotti on August 4, 2000.

19. Government's Group Exhibit Number 2S contains records of Precision Motorcars relative to the purchase or lease of the following vehicles:

- A. A 1998 Mercedes Benz S600C, Vehicle Identification Number (VIN): WDBGA76G2WA395728, by Margaret Handsman on February 28, 1998;
- B. A 1999 Mercedes Benz S600V, Vehicle Identification Number (VIN): WDBGA57G0XA407699, by Margaret Handsman on July 31, 1998, (lease);
- C. A 1999 Mercedes ML430, Vehicle Identification Number (VIN): 4JGAB72E5XA123079, by Margaret Handsman on July 29, 1999, (lease);

D. A 1999 Mercedes Benz SL600R, Vehicle Identification Number (VIN): WDBFA76FXXF173364, by Margaret Handsman on February 3, 1999; and

E. A 2001 Mercedes Benz S600V, Vehicle Identification Number (VIN): WDBNG78J71A139625, by Margaret N. Handsman on July 29, 2000.

20. Government's Group Exhibit Number 2T contains records of Pritchard Music, Inc., relative to a delivery order to Mario Racanelli, dated April 1, 1999.

21. Government's Group Exhibit Number 2U contains records of Public Storage relative to Storage Unit No. 1022 in the name of M. Racanelli including correspondence from Margaret Handsman.

22. Government's Group Exhibit Number 2V contains records of Sands Pointe Ocean Beach Condominium and Resort relative to the lease of Sands Pointe Apartment Number 1703 by Marnie Handsman.

23. Government's Group Exhibit Number 2W contains records of Sarasota Commercial Management, Inc. relative to leasing records abstracts regarding Rich Offerings, Inc. and Mario Racanelli and Marrac (Marrak) Industries, for the time period between October, 1998, through March, 2001, and December 2000, through March 2001.

24. Government's Group Exhibit Number 2X contains records of Sounds Good Stereo, of Miami, Florida, relative to purchases made by Mario Racanelli.

25. Government's Group Exhibit Number 2Y contains records of Sounds Terrific, Inc. relative to purchases made by Mario Racanelli

(Racenilli) and Marnie Handsman. The records include payment items, invoices and other documents.

26. Government's Group Exhibit Number 2Z contains records of Spaulding Construction Corporation/The Atrium Apartments, in Los Angeles, California, relative to the lease agreement for KISIS Group, LLC and Max Marrache dated June 24, 2001.

27. Government's Group Exhibit Number 2AA contains records of Steven & Co. of Beverly Hills, California. The records include sales receipts and other records regarding a jewelry purchase in the name of Max Marrache in June, 2001.

28. Government's Group Exhibit Number 2BB contains records of Storage USA relative to the rental of Storage Unit No. 972 in the name of Tommy Vayias, on December 2, 2000, in Sarasota, Florida.

29. Government's Group Exhibit Number 2CC contains records of The Crowley Group, Inc. (ReMax Properties) relative to services provided on behalf of Margaret N. Handsman, a/k/a Marnie Handsman, a/k/a Margaret Racanelli and/or Mario Racanelli related to the real properties located at 7300 Manasota Key Road, Englewood/Manasota Key, Florida; 8190 Manasota Key Road, Englewood/Manasota Key, Florida; and 7309 Pine Needle Road, Sarasota, Florida.

30. Government's Group Exhibit Number 2DD contains records of The Sanderling Club of Sarasota, Florida, relative to the membership files of Mario James Racanelli and Margaret Nathalie Handsman.

31. Government's Group Exhibit Number 2EE contains records of Trump International Hotel and Tower. The records include guest records for Jean Foster, dated April 15, 1997, Mario Racanelli, Cash Inc., and Sharon Taft, during the period between February 7, 1998, through June 19, 2000.

32. All parties stipulate that the documents contained in Government's Group Exhibit Number 2, if relevant, are authentic and admissible in evidence pursuant to Federal Rules of Evidence 803(6), as being copies of reports, records, and data compilations kept in the course of regularly conducted business activities of the named businesses and entities.

STIPULATION THREE - FINANCIAL RECORDS

1. Government's Group Exhibit Number 3A contains various credit card records of American Express. These records are in the nature of monthly statements, bills, receipts, applications for issuance of a credit card, relative to account numbers:

- A. 371383097301007 (later changed to 371383097302005) in the name of Marnie Handsman with a separate card issued in the name of Mario J. Racanelli;
- B. 372267985931000 (later changed to 372267985932008) in the names of Marnie Handsman and Rich Offerings, Inc, with a separate card issued in the name of Mario Racanelli;
- C. 373276244921008 (later changed to 373276244923004 and 373276244924002) in the names Marnie Handsman, Marie Handsman, and Rich Offerings, Inc., with a separate card issued in the name of Mario Racanelli;
- D. 373956332791005 in the name of Marnie Handsman with a separate card issued in the name of Mario Racanelli;
- E. 371530499621008 (later changed to 371530499622006) in the names of Sharon Taft and Duxiana with a separate card issued in the name of Analisse Taft;

2. Government's Group Exhibit Number 3B contains records of AmSouth Bank relative to two separate safe deposit boxes leased in the names of Margaret N. Handsman and Mario J. Racanelli, during portions of the period between 1997 and 2000, specifically, safebox numbers 2136-1 and 69.

3. Government's Group Exhibit Number 3C contains certain records of Bank of America (Formerly NationsBank) in the nature of certain monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature

cards, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks, relating to account numbers:

- A. 653172817 in the name of Mario Racanelli during relevant portions of the period between March 5, 1996 through June 15, 2000;
- B. 3259341487 in the name of Margaret N. Handsman, during relevant portions of the period from June 13, 1997, through March 19, 1999;
- C. 003430665656 in the name of Margaret N. Handsman during relevant portions of the period from March 4, 1999, through February 14, 2000;
- D. 003662377615 in the name of Rich Offerings, Inc., during relevant portions of the period from October 23, 1998, through January 31, 2000, deposit tickets/items, canceled checks, debit/credit memos, signature cards, and Currency Transaction Reports.
- E. Safe deposit box number 3353-3.

4. Government's Group Exhibit Number 3D contains records of Barnett Bank/Nations Bank, in the nature of monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature cards, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks, relative to account numbers:

- A. 001676261620 in the name of Marsha S. Cox during relevant portions of the period from August 14, 1998, through January 14, 2000;
- B. 001627657418 in the name of David C. Freund or Nancy Jo Freund, during relevant portions of the period from October 9, 1998, through November 30, 1999.

5. Government's Group Exhibit Number 3E contains records of Bank of America, in the nature of monthly statements, deposit

tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature cards, application for an account, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks, relating to account numbers:

- A. 4356023190054944 in the name of Sharon Taft, during relevant portions of the period from October 16, 2000, through March 16, 2001;
- B. 4356023004099333 in the name of Sharon Taft during relevant portions of the period from February 16, 2000, through March 16, 2001.

6. Government's Group Exhibit Number 3F contains records of Bank of Nevis International relative to two corporations, DISTAR Investments LLC, KISIS Group LLC, and Mario Racanelli. The records include copies of various incorporation and corporate resolutions and directions (or mandates) and also include various routine banking documents, including certain monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature cards, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks:

- A. Island of Nevis Office of the Registrar of Companies Endorsement Certificate for DISTAR Investments, LLC, Certificate of Formation for DISTAR Investments, Inc., Articles of Organization for DISTAR Investments, Inc., and a Mandate for Opening of Foreign Currency Account, all dated December 28, 2000;
- B. Certain monthly statements for account number 8290006, in the name of DISTAR Investment, LLC, and correspondence;
- C. Island of Nevis Office of the Registrar of Companies Certificate of Incorporation for KISIS Group LLC,

Articles of Organization for KISIS Group LLC, Certificate of Good Standing for KISIS Group LLC all dated July 2, 1997, Acceptance of Instructions and Indemnity Agreement for Facsimile Messages on behalf of KISIS Group LLC, completed and signed by Mario Racanelli, dated January 26, 2001;

- D. Acceptance of Instructions and Indemnity Agreement for Facsimile Messages, dated December 28, 2000, and by Mario Racanelli, on behalf of KISIS Group, LLC;
- E. A Mandate for appointment of Banker, Companies for KISIS Group, LLC dated December 28, 2000; copy of passport in the name of Mario J. Luca Racanelli;
- F. A Mandate for Appointment of Bankers for KISIS Group LLC by Mario Racanelli dated January 26, 2001;
- G. Specimen signatures for Mario Racanelli;
- H. Articles of Organization for KISIS Group LLC;
- I. A Mandate for Opening of Foreign Currency account, dated January 26, 2001; and
- J. Certain monthly statements and correspondence for account number 8290075 in the name of KISIS Group LLC.

7. Government's Group Exhibit Number 3G contains records of Bank of North Georgia relative to account number 000003025061 in the name of Margaret Handsman consisting of certain monthly statements, deposit tickets/items, canceled checks, debit/credit memos, and a form 1099.

8. Government's Group Exhibit Number 3H contains records of Bank One consisting of certain monthly statements, deposit tickets/items, canceled checks, debit/credit memos, signature cards and correspondence relating to account numbers:

- A. 2007709823 in the name of Marnie Handsman;

B. 1006563827 in the name of Rich Offerings, Inc.

9. Government's Group Exhibit Number 3I contains records of BB&T relative to account numbers 5804891406, 5804891368, and 1913017044 in the name of Jean Foster. The records consist of miscellaneous debit memos, cash out tickets, cashier's checks, and wire transfer records.

10. Government's Group Exhibit Number 3J contains records of Century Bank relative to account number 200263502 in the name of Tommy Vayias. The records consist of signature cards, certain monthly statements, deposit tickets/items, direct deposit statements, canceled checks and wire transfer records.

11. Government's Group Exhibit Number 3K contains records of Chase Manhattan Automotive Finance Corporation and generally contain to include documents such as contracts, credit applications and applications for certificate of title payment history relative to:

A. Account number 19910610440009 in the name of Margaret N. Handsman, originating with the purchase of a 1999 Bentley, Vehicle Identification Number (VIN): SCBZK14E7XCX61780; and

B. Account number 10000315173805 in the name of Margaret N. Handsman, originating with the purchase of a 2000 Bentley, Vehicle Identification Number (VIN): SCBZB22E6YCX63319.

12. Government's Group Exhibit Number 3L contains records of Chase Manhattan Bank relative to a December 23, 1998, money wire transaction in the amount of \$485,000, from Chase Manhattan Bank, on behalf of Morgan Stanley, and their customer, David Freund, to

NationsBank of America customer Margaret N. Handsman, account number 003259341487.

13. Government's Group Exhibit Number 3M contains records of Citibank (South Dakota), N.A., relative to account number 5424180194461031 in the name of Marnie Handsman consisting of certain 1999 monthly statements, payment items, and correspondence.

14. Government's Group Exhibit Number 3N contains records of Commerce Bank relative to account number 0361582950 in the name of Mario Racanelli with a statement dated November 20, 2000, deposit tickets, canceled checks, and debit memo; account number 0361606247 in the name of Mario Racanelli with certain monthly statements relating to the period between November, 2000, through April, 2001, deposit ticket/items, and canceled checks.

15. Government's Group Exhibit Number 3O contains records of First National Bank of Omaha relative to account number 5477259356611900 in the name of Cal South Int. Inc. and Max Marrache. The records includes a screen print of account information and a July 6, 2001, statement.

16. Government's Group Exhibit Number 3P contains certain records of First Union National Bank in the nature of certain monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature cards, customer access agreements, debit/credit memos, correspondence,

Currency Transaction Reports (CTRs), wire transaction records, and official checks, relating to account numbers:

- A. 2000003536760 in the name of MARRAC Industries, Inc.,;
- B. 2000003536757 in the name of MARRAC Industries, Inc.;
- C. 1010037627665 in the name of Eric Masanotti;
- D. 1010033423737 in the name of Christopher M. Smith;
- E. 9985171385 in the name of Christopher M. Smith;
- F. 9985031988 in the name of Christopher M. Smith and Egisto Grandoni and include a February 28, 2000, cap account application.

17. Government's Group Exhibit Number 3Q contains records of First Union National Bank Credit Card division relative to account number 5228211017721000 in the name of Christopher M. Smith. The records include First Union Credit Card Acceptance, account status print, correspondence, and certain year 2000 monthly statements.

18. Government's Group Exhibit Number 3R contains records of First Union National Bank relative to lease account number 07480 in the names of Mario James Racanelli and Margaret N. Handsman. The records include documents relative to the lease of 1997 Ford Expedition, Vehicle Identification Number (VIN): 1FMEU18W1VLA17299 on or about September 18, 1996.

19. Government's Group Exhibit Number 3S contains records of First USA/A Bank One Company, consisting generally in the nature of certain monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature

cards, RSVP certificate, application for an account, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks, relating to account numbers:

- A. 4417128092120482 (later changed to account number 4417128092948932, 4417128092009016, and 4417128095962690) in the names of Margaret Handsman and Mario J. Racanelli;
- B. 4246311222466762 in the name of Marnie N. Handsman and Rich Offerings, Inc.;
- C. 4246311222466770 in the name of Marnie N. Handsman and Rich Offerings, Inc.;
- D. 4246311222466788 in the name of Mario J. Racanelli and Rich Offerings, Inc.;
- E. 5417124863240044 in the name of Marnie Handsman and Mario J. Racanelli;
- F. 5417124863905331 in the name of Marnie Handsman and Mario J. Racanelli;
- G. 4417128095980718 (later changed to 4417128095002786) in the name of Marnie Handsman, and, also, James A. Savage, added) and include joint card member addition form, BIG requests for copy information, cash advance slips/tickets, and an affidavit of fraud claim;
- H. 4417112717124558 in the name of James A. Savage;
- I. 5417124863911107 in the name of Marnie Handsman and Mario J. Racanelli.

20. Government's Group Exhibit Number 3T contains records of Huntington National Bank relative to the lease of a 2000 Chevrolet Suburban, Vehicle Identification Number (VIN): 3GNFK16TOYG199559, on July 11, 2000.

21. Government's Group Exhibit Number 3U contains records of Kashner Davidson Securities, an investment brokerage house,

relative to account number 73025513 in the name of Tommy Vayias. The records include options account form, margin, Form #107, certain monthly statements dated April 24, 1998, through December 29, 2000, cashier's checks, checks, deposit items, transaction tickets, 1099 statements and correspondence.

22. Government's Group Exhibit Number 3V contains records of MBNA America Bank, NA, in the nature of monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature cards, application for an account, debit/credit memos, correspondence, credit reports, Currency Transaction Reports (CTRs), and official checks, relating to account numbers:

- A. 4264290013227301 in the name of Margaret N. Handsman and Margaret J. Racanelli; and
- B. 5490990013277676 in the name of Marnie Handsman and, later, Handsman and Mario Racanelli.

23. Government's Group Exhibit Number 3W contains records of Mercedes-Benz Credit Corporation relative to the financing/leasing of the following vehicles in the name of Margaret N. Handsman and Margaret Handsman:

- A. 1998 Mercedes Benz S600C, Vehicle Identification Number (VIN): WDBGA76G2WA395728, dated February 28, 1998;
- B. 1998 Mercedes Benz S600C, Vehicle Identification Number (VIN): WDBGA76G2WA395728, dated July 31, 1998;
- C. 1999 Mercedes Benz 4 Door, Vehicle Identification Number (VIN): WDBGA57G0XA407699, dated July 31, 1998;

- D. 1999 Mercedes Benz 2 Door, Vehicle Identification Number (VIN): WDBFA76FXXF173364, dated February 3, 1999; and
- E. 1999 Mercedes Benz ML430SW, Vehicle Identification Number (VIN): 4JGAB72E5XA123079, dated July 29, 1999.

24. Government's Group Exhibit Number 3X contains records of Morgan Stanley Dean Witter, an investment brokerage house, relative to account number 04-65442 in the name of David C. Freund. The records include new account form and monthly statements from the period between December 1, 1998, through December 31, 1998.

25. Government's Group Exhibit Number 3Y contains records of Olde Discount Corporation, an investment brokerage house, and include certain routine investment account documents such as investors account applications, monthly statements, canceled checks, payment items, receipts, transaction records, statements for recipients of dividend and distribution, Forms 1099 and correspondence, relative to account numbers:

- A. 06204560JMN, a/k/a 06204560444 in the name of Margaret N. Handsman;
- B. 22303964JMN in the name of Margaret N. Handsman;
- C. A6204560JMN a/k/a A6204560444 in the name of Margaret N. Handsman;
- D. C2304560JMN in the name of Margaret N. Handsman;
- E. 22304016JMN in the name of Christopher Smith and Egisto Grandoni; and
- F. 22304056JMN in the name of Christopher Smith.

26. Government's Group Exhibit Number 3Z contains records of Salomon Smith Barney, an investment brokerage house, relative to

account number 4060768019028 in the name of Margaret Nathalie Handsman. The records consist of account application and client agreement, monthly statements issued during the period between March 31, 2000, through June 30, 2000, payment items, canceled checks, and correspondence.

27. Government's Group Exhibit Number 3AA contains records of Sara Lee Credit Union (Formerly Hanes Credit Union), consisting generally in the nature of certain monthly statements, deposit tickets and items, wire transfer documentation, bills, receipts, canceled checks, signature cards, RSVP certificate, application for an account, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks, relating to the following accounts in the name of Marnie Handsman:

- A. Account number 508432;
- B. Account number 508432-215, LoanLiner advance request voucher and security agreements for 1995 and 1997, Loanliner application and credit agreement for 1997, and IRA withdrawal instruction/contribution direction;
- C. Account numbers 508432-2H5 and 508432-0H5 for 1996;
- D. Certificate account numbers 508432-2A5 and 508432-2B5 for 1996; and
- E. Money Market Inv. account number 508432-2G5 for 1996, member name and address inquiries, account information printouts, and trust application packet.

28. Government's Group Exhibit Number 3BB contains records of Sun Trust Bank, generally in the nature of certain monthly statements, deposit tickets and items, wire transfer documentation,

bills, receipts, canceled checks, signature cards, RSVP certificate, application for an account, debit/credit memos, correspondence, Currency Transaction Reports (CTRs), and official checks, relating to:

A. Account number 0014002125331 in the name of Marnie Handsman; and

B. Account number 0014000243876 in the name of Rich Offerings, Inc.

29. Government's Group Exhibit Number 3CC contains records of Sun Trust Mortgage, Inc. relative to account number 40021330972 in the name of Margaret M. Handsman. Records contains entire loan file including but not limited to Mortgage Loan History, Adj. Rate Note, Mortgage, Name Affidavit, Settlement Statement, Loan Application, Appraisal Report, and Affidavit regarding property.

30. Government's Group Exhibit Number 3DD contains records of Wachovia Auto Leasing Co. relative to lease number 37811-7 in the name of Margaret Nathalie Handsman and Mario James Racanelli. The records include lease inquiry/contract status sheet for VIN No. 1FTDX0864VKA88309, lease worksheets, vehicle invoice, title application, registration application, sales contract, application statements, lease, certificate of title, bill of sale, credit reports, and customer profile.

31. All parties stipulate that the documents contained in Government's Group Exhibit Number 3, if relevant, are authentic and admissible in evidence pursuant to Federal Rules of Evidence

803(6), as being copies of reports, records, and data compilations kept in the course of regularly conducted business activities of the named businesses and entities.

STIPULATION FOUR - OFFICIAL COURT RECORDS

1. Government's Group Exhibit Number 4A contains records of Carteret County, North Carolina, Register of Deeds, relative to marriage license number 96 030659 in the name of Mario James Racanelli and Margaret Nathlie Handsman, dated July 19, 1996.

2. Government's Group Exhibit Number 4B contains records from the criminal case files, case numbers CR340856 and CR322615, of Cuyahoga County, Ohio, Clerk of Court, relative to James Anthony Savage, for offenses occurring in 1995.

3. Government's Group Exhibit Number 4C contains records of the Florida Department of State, Division of Corporation, relative to the incorporation of Rich Offerings, Inc., filed October 14, 1998.

4. Government's Group Exhibit Number 4D contains a certificate of birth recorded in the Mecklenburg County, North Carolina, Register of Deeds Office, reflecting the March 21, 1997, birth of Selena Maria Handsman.

5. Government's Group Exhibit Number 4F contains records of the North Carolina Division of Motor Vehicles relative to North Carolina Drivers License Number 8007499 for Margaret Nathalie Handsman issued March 29, 1996, and Drivers License Number 8007499 for Margaret Nathalie Handsman issued December 12, 2000.

6. Government's Group Exhibit Number 4G contains portions of the domestic relations file, case number 2000DR013246NC, maintained

by the Sarasota County, Florida, Clerk of Court, in the case captioned, Mario Racanelli vs. Margaret Racanelli.

7. Government's Group Exhibit Number 4H contains records maintained by Sarasota County, Florida, Clerk of Court to include:

- A. Instrument No. 1999159871, including Mortgage Instrument, Adjustable Rate Rider, Planned Unit Developer Rider;
- B. Instrument No. 1999021537, Warranty Deed;
- C. Instrument No. 2000050370, Satisfaction of Mortgage
- D. Instrument No. 1999159870, Notice of Termination and Contractor's Final Affidavit and Release of Lien;
- E. Instrument No. 1999063438, Notice of Commencement;
- F. Instrument No. 2000054450, Claim of Lien.

8. Government's Group Exhibit Number 4I contains copies of certain records with respect to the Cash Appear Bond, number 40556, dated March 9, 2000, filed with the State of Florida, County of Dade, relative to Defendant Grandoni Egistot, listing the depositor as Christopher M. Smith, and Dade County Correction and Rehabilitation Department Check Number 54801.

9. Government's Group Exhibit Number 4J contains records of the State of Florida Department of Highway Safety and Motor Vehicles relative to Drivers License Number R254-540-69-202-0, issued in the name of Mario Racanelli on July 12, 2000, and Drivers License Number H532-574-70-606-0 issued in the name of Margaret Nathalie Handsman on October 21, 1998.

10. Government's Group Exhibit Number 4K contains records of Swanson Services Corporation at Collier County Detention Facility reflecting a cash receipt of forty thousand dollars as bond payment made on behalf of Mario Racanelli.

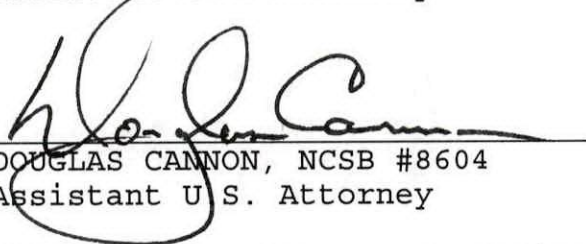
11. Government' Group Exhibit Number 4L contains copies of certain records of the United States District Court for the Middle District of North Carolina on file with respect to civil case number 1:00CV00343, in the case captioned, Jean Williams Foster, Plaintiff, v. Mario James Racanelli, a/k/a James Anthony Savage and Margaret Nathalie Handsman, Defendants.

12. All parties stipulate that the documents contained in Government's Group Exhibit Number 4, if relevant, are authentic and admissible in evidence pursuant to Federal Rules of Evidence 803(8) as being public records, reports, and data compilations in various forms, filed and kept in the regularly conducted activities of the named public offices or agencies and setting forth matters relating to the official activities of the office or agency or matters observed pursuant to duty imposed by law.

This the 4th day of March, 2002.



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